Bryan A. Skoric (Wyo. State Bar #6-2834) Dustin N. Slade (Wyo. State Bar #8-7156) Office of the Park County and Prosecuting Attorney 1002 Sheridan Avenue Cody, Wyoming, 82414

ATTORNEYS FOR DEFENDANT COLLEEN RENNER, in her official capacity as Park County Clerk.

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

EQUALITY STATE POLICY CENTER,				
Plaintiff,				
v.)				
CHUCK GRAY, in his official capacity as	Civil Action No. 25-cv-00117-SWS			
Wyoming Secretary of State;				
KAYLA WHITE , in her official capacity as				
Albany County Clerk;				
LORI SMALLWOOD, in her official capacity as)				
Big Horn County Clerk;				
CINDY LOVELACE , in her official capacity as				
Campbell County Clerk;				
LISA SMITH, in her official capacity as				
Carbon County Clerk;				
KAREN RIMMER , in her official capacity as				
Converse County Clerk;				
MELISSA JONES , in her official capacity as				
Crook County Clerk;				
JULIE FREESE, in her official capacity as				
Fremont County Clerk;				
MARY B. FEAGLER, in her official capacity as)				
Goshen County Clerk;				
BECKY KERSTEN , in her official capacity as				
Hot Springs County Clerk;				
JACKIE CAMINO , in her official capacity as				
Johnson County Clerk;)				
DEBRA LEE , in her official capacity as				
Laramie County Clerk;				
APRIL BRUNSKI , in her official capacity as				
Lincoln County Clerk;				
TRACY GOOD , in her official capacity as				

Natrona County Clerk; BECKY FREEMAN, in her official capacity as Niobrara County Clerk; COLLEEN RENNER, in her official capacity as Park County Clerk;))
MALCOLM J. ERVIN, in his official capacity as)	
Platte County Clerk;)	
EDA SCHUNK THOMPSON, in her official	
capacity as Sheridan County Clerk;	
CARRIE S. LONG, in her official capacity as)
Sublette County Clerk;)
CYNTHIA L. LANE, in her official capacity as)
Sweetwater County Clerk;)
MAUREEN MURPHY, in her official capacity as))
Teton County Clerk;)
AMANDA HUTCHINSON, in her official))
capacity as Uinta County Clerk;)
LILY RAKNESS PARRA, in her official))
capacity as Washakie County Clerk; and)
BECKY HADLOCK , in her official capacity as)
Weston County Clerk,)
))
Defendants.)

DEFENDANT COLLEEN RENNER'S MOTION TO DISMISS PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 12(b)(1)

COMES NOW, Defendant Colleen Renner ("Renner), in her official capacity as Park County Clerk, by and through her undersigned counsel, and hereby submits this Motion to Dismiss Plaintiff Equality State Policy Center's ("ESPC") Complaint for Declaratory and Injunctive Relief ("Complaint") pursuant to Federal Rule of Civil Procedures 12(b)(1) and 12(b)(6).

As set forth in the attached memorandum, Plaintiff's claims against Defendant Renner are non-justiciable under Article III of the United States Constitution because: (1) Plaintiff lacks standing; (2) any such claims are otherwise unripe; and (3) any such claims are moot.

Dated this 14th day of July, 202	y of July, 2025.	day	14th	this	Dated
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<u>/s/</u> Bryan A. Skoric (WSB #6-2834) Park County and Prosecuting Attorney

Dustin N. Slade (WSB No. 8-7156) Deputy Park County Attorney Park County Attorney's Office 1002 Sheridan Ave. Cody, Wyoming 82414 (307) 527-8660

ATTORNEYS FOR DEFENDANT COLLEEN RENNER, in her official capacity as Park County Clerk

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of July, 2025, a copy of the foregoing Motion was electronically filed and service via the CM/ECF e-service to all counsel of record.

Dustin N. Slade